

EXHIBIT 11

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WINDSOR SECURITIES, LLC	:	
	:	Civil Action No. 16-cv-01533 (GBD)
Plaintiff	:	
v.	:	
	:	
ARENT FOX, LLP	:	
and	:	
JULIUS ROUSSEAU, III, ESQUIRE	:	
	:	
Defendants	:	JURY TRIAL DEMANDED

PLAINTIFFS' RESPONSE TO DEFENDANTS' FIRST SET OF INTERROGATORIES

Plaintiff Windsor Securities, LLC, by and through its undersigned counsel, Alan L. Frank Law Associates, P.C., hereby respond to the First Set of Interrogatories of Defendants Arent Fox LLP ("Arent Fox") and Julius Rousseau, III ("Rousseau", and, collectively, with Arent Fox, "Defendants"), as follows:

All responses provided herein are made without waiving and, on the contrary, with preserving:

1. All questions as to competency, relevancy, materiality, privilege and admissibility of evidence, for any purpose, in any subsequent proceeding or the trial of this or any other actions;
2. The right to object on any ground, at any time, to a demand for further response to this or any other request for production or discovery procedures involving or relating to the subject matter of this Request for Production;
3. The right to further supplement and/or amend these responses based upon the discovery of additional information or documents;
4. The right to object to the use of any documents or evidence by Defendants or any other party in any subsequent proceedings, or the trial of this or any other action, on any ground;

5. The attorney-client, work-product and expert privileges and, accordingly, any subsequent response or production should not constitute a waiver of said privilege(s);

6. Plaintiffs also incorporate herein by reference all pleadings and responses to discovery filed and served by it in this action.

I. GENERAL OBJECTIONS:

1. Plaintiffs object to each of Defendant's Discovery Requests to the extent it seeks:

- a. Attorney - Work Product;
- b. Privileged information, including but not limited to, information or documents which are subject to the attorney-client privilege;
- c. Trade secrets and other confidential and/or proprietary information;
- d. Documents and tangible things prepared in anticipation of litigation by Plaintiffs, Plaintiffs' attorneys, agents, or representatives; or
- e. Information or documents otherwise not discoverable under the Federal Rules of Civil Procedure.

2. Plaintiffs object to each of Defendants' discovery requests to the extent that the information sought is not relevant to the subject matter involved in this litigation nor reasonably calculated to lead to discovery of admissible evidence.

3. Plaintiffs object to each discovery request to the extent that it is overly broad, unduly burdensome, intentionally harassing and oppressive and seeks information which is within the knowledge, control and/or custody of the Defendants.

4. Plaintiffs object generally to each discovery request to the extent that it is brought in bad faith with the intent to cause unreasonable annoyance, embarrassment, oppression, burden and expense to Plaintiffs.

II. RESERVATION OF RIGHT TO SUPPLEMENT:

Plaintiffs are providing these responses and objections to Defendants' discovery requests. These responses and objections are made while discovery is ongoing. Plaintiff specifically reserves the right to supplement its responses and objections from time to time as material additions and/or changes occur.

III. RESPONSES TO DEFENDANTS' FIRST SET OF INTERROGATORIES

1. State with specificity all damages You claim to have suffered based on Defendants' purported legal malpractice, as described in the Complaint, how You calculated those damages, and identify all persons with knowledge of those facts and all documents relating to those facts.

ANSWER: Objection. Plaintiff objects to this request to the extent it seeks privileged information, including but not limited to, information which is subject to the attorney-client privilege and/or work-product doctrine. Without waiving these objections, and by way of further answer, Plaintiff's damages to date are as follows:

1. BITTER

Death Benefit under the Bitter Policy-	\$2,000,000
Amount Available under the policy because of interest-	\$2,030,904.11
Amount Paid to Insurer for Interpleader Attorneys fees -	\$17,500
Settlement - Windsor received	\$650,000
Amount lost under the policy because of contest of entitlement to death benefits-	\$1,380,904.11
Estimated Legal Fees/Costs Damages Associated with Bitter Action(s)	\$457,928.08

(includes fees paid to Arent Fox and Welch Thompson and the Antonino Firms and costs)

2. ACKER

Death Benefit under the Acker Policy-	\$1,000,000
Amount Available under the policy because of interest-	\$1,135,928.80
Amount Paid to Insurer for Interpleader Attorneys fees -	\$15,103
Settlement - Windsor received	\$720,648.34
Amount lost under the policy because of contest of entitlement to death benefits-	\$415,280.46
Estimated Legal Fees/Costs Damages Associated with the Acker Action	\$226,380.16

(includes fees paid to Arent Fox and Welch Thompson and the Antonino Firms and costs)

3. COLLINS

Death Benefit under the Collins Policy-	\$2,000,000
Amount Available under the policy because of interest-	\$2,018,739.73
Amount Paid to Insurer for Interpleader Attorneys fees -	\$14,000
Settlement - Windsor received	\$816,334.54
Amount lost under the policy because of contest of entitlement to death benefits-	\$1,202,405.19
Estimated Legal Fees/Costs Damages Associated with the Collins Action	\$200,579.05

(includes fees paid to Arent Fox and Welch Thompson and the Antonino Firms and costs)

4. COPPOCK (still alive no entitlement to death benefits until death of insured)

Death Benefit under Coppock policy	\$1,000,000
settlement paid to Coppock -	\$12,000
Amount lost under the policy because of contest of entitlement to death benefits	\$12,000
Estimated Legal Fees/Costs Damages Associated with the Coppock Action	\$151,416.44

(includes fees paid to Arent Fox and Welch Thompson and the Antonino Firms and costs)

5. **STAMATOV** (still alive no entitlement to death benefits until death of insured)

Death Benefit under Stamatov policy -	\$2,000,000
settlement paid to Stamatov -	\$12,000

Amount lost under the policy because of contest of entitlement to death benefits \$12,000
Estimated Legal Fees/Costs Damages Associated with the Collins Action \$36,915.59
(includes fees paid to Arent Fox and Welch Thompson and the Antonino Firms and costs)
6. **ARENT FOX FEES PAID BY WINDSOR** relating to premium financing \$112,776.85
7. **HERRICK FEES PAID BY WINDSOR** relating to premium financing \$144,168.11
8. **LEGAL FEES/COSTS FOR THE HATHAWAY MATTER** - to be determined
9. **LEGAL FEES/COSTS FOR THE COHEN MATTER** - to be determined
10. **LEGAL FEES/COSTS FOR THIS MATTER** (paid to various law firms including Alan L. Frank Law Associates, the Antonino Firm, and Welch Thompson) - to be determined
11. **INTEREST-** To be determined

The statutory rate for prejudgment interest is 9% per annum. N.Y.C.P.L.R § 5004.

Therefore, Plaintiff will be seeking interest from the date each of the above trusts defaulted on their premium finance loan.

See attached memorandums which identify how the damages were calculated. By way of further answer, the above calculations are based on Windsor's allocation of attorney bills and fees paid by firm and client matter and were done by Mr. Prusky to the best of his knowledge, information and belief. Windsor specifically reserves the right to supplement/amend the

calculations/allocations to the extent needed based on additional information and/or analysis. The calculations are estimates based on invoices paid to date.

Further, attorney time, fees and costs continue to be incurred in this action as well as in other premium finance matters in which Arent Fox, LLP an Jule Rousseau, Esquire represented Windsor. For that reason, Windsor specifically reserves the right to supplement/amend the foregoing damages calculations/allocations to include these yet to be incurred fees and costs.

The persons with knowledge of Plaintiff's damages are Steven Prusky, Jule Rousseau, Darin Judd, Esquire, Lauren Antonino, Esquire, the Trustees for the Bitter Trust, the Collins Trust, the Coppock Trust, the Acker, Trust, and the Stamatov Trust, and counsel for those Trust, Joe Wood, Esquire and the Designees of Arent Fox, LLP, Herrick Feinstein LLP, Thompson Welch Soroko & Gilbert LLP, and the Antonino Firm, LLC.

Plaintiff is providing these responses and objections to Defendants' discovery requests. while discovery is ongoing and while Plaintiff continues to incur legal fees and costs which are an element of Plaintiff's damages. Therefore Plaintiff specifically reserves the right to supplement its response to this interrogatory as material additions and/or changes occur.


2. State with specificity what steps You took to mitigate those purported damages, and identify all persons with knowledge of those facts and all documents relating to those facts.

ANSWER: Objection. Plaintiff objects to this request to the extent it seeks privileged information, including but not limited to, information or documents which are subject to the attorney-client privilege and/or work-product doctrine, and seeks information which in the possession of the Defendants. Without waiving these objections, and by way of further answer,

and as explained more fully in Plaintiff's Complaint, Plaintiff first litigated its rights and entitlement to the death benefits under each of the Policies (Bitter, Acker, Collins, Coppock and Stamatov). However, following the adverse rulings in the Bitter, Acker, and Collins Actions, described in detail in Plaintiff's Complaint, and to avoid, minimize, or reduce the damage caused by the Defendants' acts and omissions, Windsor entered into settlement agreements in each of the Bitter, Acker, Collins, Coppock and Stamatov Actions. Each of these Settlement Agreements is being produced herewith. The persons with knowledge of Plaintiff's efforts to mitigate are Steven Prusky, Darin Judd, Esquire, Lauren Antonino, Esquire, the Trustees for the Bitter Trust, the Collins Trust, the Coppock Trust, the Acker Trust, and the Stamatov Trust, and counsel for those Trusts, Joe Wood, Esquire.

ALAN L. FRANK LAW ASSOCIATES, P.C.

BY:



ALAN L. FRANK, ESQUIRE

Attorney ID. # 34414

SAMANTHA A. MILLROOD, ESQUIRE

Attorney ID. # 84700

Alan L. Frank Law Associates, P.C.

135 Old York Road

Jenkintown, PA 19046

215-935-1000 - phone

215-935-1110 - fax

E-mail: afrank@alflaw.net

Attorney for Plaintiff Windsor Securities, LLC

DATED: July 11, 2016

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

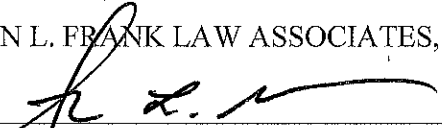
<u>WINDSOR SECURITIES, LLC</u>	:	
	:	Civil Action No. 16-cv-01533 (GBD)
Plaintiff	:	
v.	:	
ARENT FOX, LLP	:	
and	:	
JULIUS ROUSSEAU, III, ESQUIRE	:	CERTIFICATE OF SERVICE
	:	
Defendants	:	JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of July, 2016, a copy of Plaintiffs' Response to Defendants' First Set of Interrogatories with attachments were sent via UPS Overnight Mail and Email to the following:

Peter N. Wang, Esquire
Douglas S. Heffer, Esquire
Adam Gregory Pence, Esquire
Foley & Lardner LLP
90 Park Avenue
New York, New York, 10016
pwang@foley.com
dheffer@foley.com
apence@foley.com

ALAN L. FRANK LAW ASSOCIATES, P.C.



Alan L. Frank, Esquire
Samantha A. Millrood, Esquire
(Admitted *pro hac vice*)

1601 Gravesend Neck Rd., Suite 903
Brooklyn, NY 11229
T: 215.935.1000/F: 215.935.1110
E-mail: afrank@alflaw.net

And

135 Old York Road
Jenkintown, PA 19046
T: 215.935.1000/F: 215.935.1110
E-mail: afrank@alflaw.net

Dated: July 11, 2016

Attorneys for Plaintiff Windsor Securities, LLC

DAMAGES FOR WINDSOR V. ARENT FOX

1. BITTER

Death Benefit under the Bitter Policy- \$2,000,000

Amount Available under the policy because of interest-\$2,030,904.11

Amount Paid to Insurer for Interpleader Attorneys fees -\$17,500

Settlement - Windsor received \$650,000

Amount lost under the policy because of contest of entitlement to death benefits- \$1,380,904.11

2. ACKER

Death Benefit under the Bitter Policy- \$1,000,000

Amount Available under the policy because of interest-\$1,135,928.80

Amount Paid to Insurer for Interpleader Attorneys fees -\$15,103

Settlement - Windsor received \$720,648.34

Amount lost under the policy because of contest of entitlement to death benefits- \$415,280.46

3. COLLINS

Death Benefit under the Bitter Policy- \$2,000,000

Amount Available under the policy because of interest-\$2,018,739.73

Amount Paid to Insurer for Interpleader Attorneys fees -\$14,000

Settlement - Windsor received \$816,334.54

Amount lost under the policy because of contest of entitlement to death benefits- \$1,202,405.19

4. COPPOCK (still alive no entitlement to death benefits until death of insured)

Death Benefit under policy - \$1,000,000

settlement paid to Coppock - \$12,000

5. STAMATOV (still alive no entitlement to death benefits until death of insured)

Death Benefit under policy - \$2,000,000

settlement paid to Coppock - \$12,000

The statutory rate for prejudgment interest is 9% per annum. N.Y.C.P.L.R. § 5004. Therefore, Plaintiff will be seeking interest from the date each of the above trusts defaulted on the premium finance loan.

BITTER (this includes the arb and the Carol Bitter action)

Arent Fox Fees	\$2243.00	
	\$38500.00	
	\$19000.00	
	\$29000.00	
	\$29000.00	
	\$4200.00	
	\$17370.00	
	\$65000.00	
	\$61700.00	
 TOTAL ARENT FOX FEES PAID IN BITTER		 <u>\$266,013.00</u>
 Thompson Welch fees	\$5392.95	
	\$712.00	
	\$30,330	
	\$18066	
 TOTAL THOMPSON WELCH FEES PAID IN BITTER		 <u>\$54,500.95</u>
 Antonino Firm fees		
 TOTAL ANTONINO FIM FEES PAID IN BITTER		 <u>\$5800.00</u>
 Costs		
Vital records	\$25	
AAA	\$7750	
	\$27895	
	\$15000	
	\$15000	
	\$24450	
	\$23250	
Richard Brown	\$5000	
Jane Rose Court Reporting	\$3901.40	
	\$250	
	\$1816.25	
	\$3127.75	
	\$2848.25	
Sun Life Insurance	\$250	
Attison Baker	\$703.48	
Digital One	\$327	
Bart Hillbrae	\$20	
 TOTAL COSTS PAID IN BITTER		 <u>\$131,614.13</u>
 FEES/COSTS DAMAGES ASSOCIATED WITH BITTER ACTION		 <u>\$457,928.08</u>

STAMATOV

Thompson Welch fees	\$680.28
	\$3560
	\$5900
	\$400
	\$4000
	\$4310

TOTAL THOMPSON WELCH FEES PAID IN STAMATOV	\$18,850.28
--	-------------

Antonino Firm fees	\$530
	\$394
	\$118
	\$2282
	\$1090
	\$566
	\$3091
	\$600
	\$320
	\$1202
	\$709
	\$250
	\$745.81
	\$704
	\$250

TOTAL ANTONINO FIRM FEES PAID IN STAMATOV	\$12,851.81
---	-------------

Costs	
Offit Kurman	\$5231.50

TOTAL COSTS PAID in STAMATOV	\$5213.50
------------------------------	-----------

FEES/COSTS DAMAGES ASSOCIATED WITH STAMATOV ACTION	\$36,915.59
--	-------------

COPPOCK

Thompson Welch fees	\$1920.34
	\$3750
	\$7500
	\$500
	\$96402
	\$1400
	\$8000

TOTAL THOMPSON WELCH FEES PAID IN COPPOCK	\$119,472.34
---	--------------

Antonino Firm Fees	\$830
	\$221
	\$1305
	\$118
	\$3410
	\$906
	\$4957
	\$3325
	\$1000
	\$900
	\$2361
	\$7723
	\$1160
	\$540
	\$207
	\$585

TOTAL ANTONINO FIRM FEES PAID IN COPPOCK	\$31,548.00
--	-------------

Costs	
flights	\$396.10

TOTAL COSTS PAID IN COPPOCK	\$396.10
-----------------------------	----------

FEES/COSTS DAMAGES ASSOCIATED WITH COPPOCK ACTION	\$151,416.44
---	--------------

COLLINS

Thompson Welch fees	\$7627.50
	\$3135.25
	\$12775
	\$27000
	\$11000
	\$8850
	\$30000

TOTAL THOMPSON WELCH FEES PAID in COLLINS	\$100,387.75
---	--------------

Antonino Firm LLC	\$5365.50
	\$3592
	\$2950
	\$7746
	\$5060
	\$1458
	\$1071
	\$2679
	\$9700
	\$10228
	\$5637
	\$10200
	\$3410
	\$5100
	\$1996
	\$7817
	\$6660
	\$1500
	\$1320
	\$4530
	\$993

TOTAL ANTONINO FIRM FEES PAID in COLLINS	\$99,012.50
--	-------------

Costs	
IT Acceleration	\$258.48
Flights	\$228.60
	\$454.10
	\$15
	\$227.05
	\$27
	\$227.05

TOTAL COSTS PAID in COLLINS	\$1,178.80
-----------------------------	------------

FEES/COSTS DAMAGES ASSOCIATED WITH COLLINS ACTION	\$200,579.05
---	--------------

ACKER

Thompson Welch fees	\$18600	
	\$475	
	\$14155	
	\$20000	
	\$10000	
	\$10800	
	\$18000	
TOTAL THOMPSON WELCH FEES PAID IN ACKER		\$92,030.00

Antonino Firm LLC	\$5000	
	\$5813	
	\$4360	
	\$2870	
	\$7359	
	\$5290	
	\$1418	
	\$1071	
	\$2679	
	\$10800	
	\$13300	
	\$5646	
	\$10100	
	\$2330	
	\$5100	
	\$2241	
	\$7817	
	\$6201	
	\$450	
	\$1280	
	\$4260	
	\$1320	
	\$7310	
TOTAL ANTONIO FIRM FEES IN ACKER		\$114,005.00

Costs		
Technical Resource center	\$3500	
Flights	\$19	
	\$29	
	\$227.05	
	\$369.27	
Hotels	\$360.42	
	\$360.42	
JAMS	\$3330	
Karen Canoff, Esq	\$12150	
TOTAL COSTS IN ACKER		\$20,345.16
FEES/COSTS DAMAGES ASSOCIATED WITH STAMATOV ACTION		\$226,380.16

ARENT FOX FEES PAID BY WINDSOR relating to premium financing	\$12,776.85
--	-------------

HERRICK FEES PAID BY WINDSOR relating to premium financing	\$144,168.11
--	--------------

6/30/2016

Account transactions
All accounts

Page 1

Num	Date	Payee	Memo	Category	Amount
Month Ending 9/30/2014					
1383	9/1/2014	The Antonino Firm	8/27/14; applied to report ...	LLC : Legal - Acker	(5,000.00)
Total Month Ending 9/30/2014					(5,000.00)
Month Ending 10/31/2014					
1397	10/22/2014	The Antonino Firm	apply \$5k from retrainer	LLC : Legal - Acker	(5,813.00)
1398	10/28/2014	Thompson, Welch, Soroko & Gilber	10/20/14; bitter, collins, a...	LLC : Legal - Acker	(18,600.00)
Total Month Ending 10/31/2014					(24,413.00)
Month Ending 12/31/2014					
1406	12/5/2014	The Antonino Firm	12/1/14; replace #1401 (l...	LLC : Legal - Acker	(4,360.00)
1408	12/11/2014	The Antonino Firm	12/11/14 was #7619 ..	LLC : Legal - Acker	(2,870.00)
1401	12/15/2014	The Antonino Firm	11/6/14; was \$9202; LOST	LLC : Legal - Acker	0.00
Total Month Ending 12/31/2014					(7,230.00)
Month Ending 1/31/2015					
1414	1/27/2015	The Antonino Firm	1/16/15; december Bitter,...	LLC : Legal - Acker	(7,359.00)
Total Month Ending 1/31/2015					(7,359.00)
Month Ending 3/31/2015					
1418	3/26/2015	The Antonino Firm	3/3/15	LLC : Legal - Acker	(5,290.00)
1423	3/26/2015	The Antonino Firm		LLC : Legal - Acker	(1,418.00)
1423	3/26/2015	The Antonino Firm	1/3 of time on houchins	LLC : Legal - Acker	(1,071.00)
Total Month Ending 3/31/2015					(7,779.00)
Month Ending 4/30/2015					
1431	4/14/2015	Thompson, Welch, Soroko & Gilber	4/8/15 Acker	LLC : Legal - Acker	(475.00)
1438	4/21/2015	The Antonino Firm	4/1 '4/15	LLC : Legal - Acker	(2,679.00)
Total Month Ending 4/30/2015					(3,154.00)
Month Ending 5/31/2015					
1472	5/27/2015	The Antonino Firm	5/19/15 through 5/8/15	LLC : Legal - Acker	(10,800.00)
1475	5/27/2015	Thompson, Welch, Soroko & Gilber	5/18/15; Acker	LLC : Legal - Acker	(14,155.00)
Total Month Ending 5/31/2015					(24,955.00)
Month Ending 6/30/2015					
1482	6/10/2015	Technical Resource Center	6/9/15	LLC : Legal - Acker	(3,500.00)
1485	6/25/2015	The Antonino Firm	6/17/15	LLC : Legal - Acker	(13,300.00)
1487	6/25/2015	Thompson, Welch, Soroko & Gilber	6/17/15	LLC : Legal - Acker	(20,000.00)
Total Month Ending 6/30/2015					(36,800.00)

6/30/2016

Page 2

Account transactions
All accounts

Num	Date Payee	Memo	Category	Amount
Month Ending 7/31/2015				
	7/10/2015 DELTA AIR LINES	flights to atlanta	LLC : Legal - Acker	(19.00)
	7/14/2015 US AIRWAYS	flights to Phoenix Judd	LLC : Legal - Acker	(29.00)
	7/14/2015 AA AIR TICKET SALE 4DALLAS	flights to Knoxville Antonino	LLC : Legal - Acker	(227.05)
	7/15/2015 GOGOAIR.COM	internet	LLC : Legal - Acker	(8.95)
	7/15/2015 AA AIR TICKET SALE 4DALLAS	flights to Knoxville Antonino	LLC : Legal - Acker	(227.05)
	7/17/2015 ST. CECILIA ATLANTA	Habersham	LLC : Legal - Acker	(369.27)
1496	7/17/2015 The Antonino Firm	7/11/15	LLC : Legal - Acker	(5,646.00)
	7/20/2015 FAIRFIELD INN 229 ATLANTA	sgp atlanta	LLC : Legal - Acker	(360.42)
	7/20/2015 FAIRFIELD INN 229 ATLANTA	Judd atlanta	LLC : Legal - Acker	(360.42)
1503	7/30/2015 Thompson, Welch, Soroko & Gilber	7/23/15	LLC : Legal - Acker	(10,000.00)
1506	7/30/2015 JAMS	7/24/15	LLC : Legal - Acker	(3,330.00)
	Total Month Ending 7/31/2015			(20,577.16)
Month Ending 9/30/2015				
1444	9/9/2015 The Antonino Firm	8/31/15	LLC : Legal - Acker	(10,100.00)
1454	9/30/2015 Karen Canoff, Esq.	9/23/15	LLC : Legal - Acker	(12,150.00)
	Total Month Ending 9/30/2015			(22,250.00)
Month Ending 10/31/2015				
1455	10/14/2015 The Antonino Firm	10/5/15	LLC : Legal - Acker	(2,330.00)
1458	10/16/2015 The Antonino Firm	10/9/15	LLC : Legal - Acker	(5,100.00)
	Total Month Ending 10/31/2015			(7,430.00)
Month Ending 11/30/2015				
1464	11/2/2015 Thompson, Welch, Soroko & Gilber	10/27/15	LLC : Legal - Acker	(10,800.00)
1468	11/10/2015 The Antonino Firm	11/6/15	LLC : Legal - Acker	(2,241.00)
	Total Month Ending 11/30/2015			(13,041.00)
Month Ending 12/31/2015				
1516	12/22/2015 Thompson, Welch, Soroko & Gilber	12/15/15	LLC : Legal - Acker	(18,000.00)
	Total Month Ending 12/31/2015			(18,000.00)
Month Ending 1/31/2016				
1469	1/4/2016 The Antonino Firm	#15: 12/22/15	LLC : Legal - Acker	(7,817.00)
	Total Month Ending 1/31/2016			(7,817.00)
Month Ending 2/29/2016				
1524	2/4/2016 The Antonino Firm		LLC : Legal - Acker	(6,201.00)

6/30/2016

Account transactions
All accounts

Page 3

Num	Date Payee	Memo	Category	Amount
Total Month Ending 2/29/2016				
(6,201.00)				
Month Ending 5/31/2016				
1536	5/17/2016 The Antonino Firm	april	LLC : Legal - Acker	(450.00)
1536	5/17/2016 The Antonino Firm	march	LLC : Legal - Acker	(1,280.00)
1536	5/17/2016 The Antonino Firm	january	LLC : Legal - Acker	(4,260.00)
1536	5/17/2016 The Antonino Firm	feb	LLC : Legal - Acker	(1,320.00)
Total Month Ending 5/31/2016				(7,310.00)
Grand Total				(219,316.16)

6/30/2016

Account transactions
All accounts

Page 1

Num	Date Payee	Memo	Category	Amount
Month Ending 11/30/2010				
1122	11/10/2010 Arent Fox	11/5/10; bit...	LLC : Legal - Bitter (Barnes litig...	(2,243.00)
Total Month Ending 11/30/2010				(2,243.00)
Month Ending 2/28/2013				
2932	2/7/2013 vital records	2/7/13; for ...	LLC : Legal - Bitter (Barnes litig...	(25.00)
Total Month Ending 2/28/2013				(25.00)
Month Ending 6/30/2013				
1276	6/3/2013 Richard Brown, Attor...	6/3/13; Bitt...	LLC : Legal - Bitter (Barnes litig...	(5,000.00)
1278	6/19/2013 Arent Fox	6/13/13	LLC : Legal - Bitter (Barnes litig...	(38,500.00)
Total Month Ending 6/30/2013				(43,500.00)
Month Ending 8/31/2013				
1289	8/12/2013 Arent Fox	8/6/13 for J...	LLC : Legal - Bitter (Barnes litig...	(19,000.00)
1292	8/12/2013 Arent Fox	8/6/13; July	LLC : Legal - Bitter (Barnes litig...	(29,000.00)
Total Month Ending 8/31/2013				(48,000.00)
Month Ending 9/30/2013				
	9/9/2013 AMERICAN ARBITRA...	WSI: paid b...	LLC : Legal - Bitter (Barnes litig...	(7,750.00)
Total Month Ending 9/30/2013				(7,750.00)
Month Ending 10/31/2013				
	10/16/2013 AMERICAN ARBITRA...	7201: AME...	LLC : Legal - Bitter (Barnes litig...	(27,895.00)
Total Month Ending 10/31/2013				(27,895.00)
Month Ending 12/31/2013				
1318	12/16/2013 Arent Fox	12/11/13; s...	LLC : Legal - Bitter (Barnes litig...	(29,000.00)
1313	12/18/2013 Jane Rose Reporting	12/11/13	LLC : Legal - Bitter (Barnes litig...	(3,901.40)
Total Month Ending 12/31/2013				(32,901.40)
Month Ending 1/31/2014				
1320	1/2/2014 Jane Rose Reporting	12/23/13	LLC : Legal - Bitter (Barnes litig...	(250.00)
1324	1/3/2014 Arent Fox	12/30/13	LLC : Legal - Bitter (Barnes litig...	(61,700.00)
1319	1/31/2014 Sun Life Insurance C...	12/18/13; r...	LLC : Legal - Bitter (Barnes litig...	(250.00)
Total Month Ending 1/31/2014				(62,200.00)
Month Ending 2/28/2014				
1326	2/10/2014 Atkinson-Baker, Inc.	2/3/14; sgp...	LLC : Legal - Bitter (Barnes litig...	(703.48)
1328	2/10/2014 Jane Rose Reporting	2/4/14 aaa	LLC : Legal - Bitter (Barnes litig...	(1,816.25)

6/30/2016

Account transactions
All accounts

Page 2

Num	Date	Payee	Memo	Category	Amount
1329	2/10/2014	Jane Rose Reporting	2/4/14; AAA	LLC : Legal - Bitter (Barnes litig...	(3,127.75)
1330	2/10/2014	Jane Rose Reporting	2/4/14; AAA	LLC : Legal - Bitter (Barnes litig...	(2,848.25)
	2/11/2014	AMERICAN ARBITRA...	Windsor LL...	LLC : Legal - Bitter (Barnes litig...	(15,000.00)
	2/19/2014	AMERICAN ARBITRA...	7201: AME...	LLC : Legal - Bitter (Barnes litig...	(15,000.00)
1332	2/19/2014	Digital One	2/13/14	LLC : Legal - Bitter (Barnes litig...	(327.00)
Total Month Ending 2/28/2014					(38,822.73)
Month Ending 3/31/2014					
	3/1/2014	AMERICAN ARBITRA...	Windsor LL...	LLC : Legal - Bitter (Barnes litig...	(24,450.00)
	3/4/2014	BART MILLBRAE ST...	8&NR; expc...	LLC : Legal - Bitter (Barnes litig...	(20.00)
1352	3/31/2014	Arent Fox	3/26/14	LLC : Legal - Bitter (Barnes litig...	(65,000.00)
Total Month Ending 3/31/2014					(89,470.00)
Month Ending 4/30/2014					
	4/4/2014	AMERICAN ARBITRA...	from WS LLC	LLC : Legal - Bitter (Barnes litig...	(23,250.00)
Total Month Ending 4/30/2014					(23,250.00)
Month Ending 4/30/2015					
1434	4/14/2015	Thompson, Welch, S...	4/8/15 Barn...	LLC : Legal - Bitter (Barnes litig...	(5,392.95)
Total Month Ending 4/30/2015					(5,392.95)
Month Ending 5/31/2015					
1478	5/27/2015	Thompson, Welch, S...	5/18/15; co...	LLC : Legal - Bitter (Barnes litig...	(712.00)
Total Month Ending 5/31/2015					(712.00)
Grand Total					(382,162.08)

6/30/2016

Account transactions
All accounts

Page 1

Num	Date Payee	Memo	Category	Amount
Month Ending 3/31/2015				
1419	3/10/2015 Thompson, W...	3/3/15 thru 1/31/15	LLC : Legal - Bitter, Collins, Ac...	(30,330.00)
1420	3/10/2015 Thompson, W...	3/3/15 thru 2/28/15?	LLC : Legal - Bitter, Collins, Ac...	(18,066.00)
Total Month Ending 3/31/2015				(48,396.00)
Month Ending 6/30/2016				
1542	6/17/2016 The Antonino ...	6/16/16; hathaway, cohen	LLC : Legal - Bitter, Collins, Ac...	(5,800.00)
Total Month Ending 6/30/2016				(5,800.00)
Grand Total				(54,196.00)

6/30/2016

Account transactions
All accounts

Num	Date	Payee	Memo	Category	Amount
Month Ending 10/31/2014					
1397	10/22/2014	The Antonino Firm		LLC : Legal - Collins	(5,366.50)
Total Month Ending 10/31/2014					(5,366.50)
Month Ending 12/31/2014					
1406	12/5/2014	The Antonino Firm		LLC : Legal - Collins	(3,592.00)
1408	12/11/2014	The Antonino Firm		LLC : Legal - Collins	(2,950.00)
1407	12/16/2014	Thompson, Welc...	12/11/14; Bitter, collins ac...	LLC : Legal - Collins	(7,627.50)
Total Month Ending 12/31/2014					(14,169.50)
Month Ending 1/31/2015					
1414	1/27/2015	The Antonino Firm		LLC : Legal - Collins	(7,746.00)
Total Month Ending 1/31/2015					(7,746.00)
Month Ending 3/31/2015					
1418	3/26/2015	The Antonino Firm		LLC : Legal - Collins	(5,060.00)
1423	3/26/2015	The Antonino Firm		LLC : Legal - Collins	(1,458.00)
1423	3/26/2015	The Antonino Firm	1/3 of time on hounchin	LLC : Legal - Collins	(1,071.00)
Total Month Ending 3/31/2015					(7,589.00)
Month Ending 4/30/2015					
1430	4/14/2015	Thompson, Welc...	4/18/15; Collins	LLC : Legal - Collins	(3,135.25)
1438	4/21/2015	The Antonino Firm		LLC : Legal - Collins	(2,679.00)
Total Month Ending 4/30/2015					(5,814.25)
Month Ending 5/31/2015					
1472	5/27/2015	The Antonino Firm		LLC : Legal - Collins	(9,700.00)
1474	5/27/2015	Thompson, Welc...	5/20/15; collins	LLC : Legal - Collins	(12,775.00)
Total Month Ending 5/31/2015					(22,475.00)
Month Ending 6/30/2015					
1485	6/25/2015	The Antonino Firm		LLC : Legal - Collins	(10,228.00)
Total Month Ending 6/30/2015					(10,228.00)
Month Ending 7/31/2015					
1494	7/10/2015	DELTA AIR LINE...	flights to knoxville	LLC : Legal - Collins	(228.60)
	7/14/2015	AA AIR TICKET ...	flights to Knoxville	LLC : Legal - Collins	(454.10)
	7/14/2015	US AIRWAYS ...	flights to Phoenix; Judd	LLC : Legal - Collins	(15.00)
	7/14/2015	AA AIR TICKET ...		LLC : Legal - Collins	(227.05)
	7/14/2015	Thompson, Welc...	7/8/15; was to be for \$27, ...	LLC : Legal - Collins	(27.00)

6/30/2016

Account transactions
All accounts

Num	Date Payee	Memo	Category	Amount
1496	7/15/2015 AA AIR TICKET ...		LLC : Legal - Collins	(227.05)
1499	7/17/2015 The Antonino Firm		LLC : Legal - Collins	(5,637.00)
1497	7/21/2015 Thompson, Welc...	7/14/15; replace 1494	LLC : Legal - Collins	(27,000.00)
1502	7/28/2015 IT Acceleration	7/14/15; to rebuild hard dr...	LLC : Legal - Collins	(258.48)
	7/30/2015 Thompson, Welc...	7/23/15	LLC : Legal - Collins	(11,000.00)
Total Month Ending 7/31/2015				(45,074.28)
Month Ending 9/30/2015				
1444	9/9/2015 The Antonino Firm		LLC : Legal - Collins	(10,200.00)
Total Month Ending 9/30/2015				(10,200.00)
Month Ending 10/31/2015				
1455	10/14/2015 The Antonino Firm		LLC : Legal - Collins	(3,410.00)
1458	10/16/2015 The Antonino Firm		LLC : Legal - Collins	(5,100.00)
Total Month Ending 10/31/2015				(8,510.00)
Month Ending 11/30/2015				
1463	11/2/2015 Thompson, Welc...	10/27/15	LLC : Legal - Collins	(8,850.00)
1468	11/10/2015 The Antonino Firm		LLC : Legal - Collins	(1,596.00)
Total Month Ending 11/30/2015				(10,446.00)
Month Ending 12/31/2015				
1518	12/22/2015 Thompson, Welc...	12/15/15	LLC : Legal - Collins	(30,000.00)
Total Month Ending 12/31/2015				(30,000.00)
Month Ending 1/31/2016				
1469	1/4/2016 The Antonino Firm		LLC : Legal - Collins	(7,817.00)
Total Month Ending 1/31/2016				(7,817.00)
Month Ending 2/29/2016				
1524	2/4/2016 The Antonino Firm		LLC : Legal - Collins	(6,660.00)
Total Month Ending 2/29/2016				(6,660.00)
Month Ending 5/31/2016				
1536	5/17/2016 The Antonino Firm	april	LLC : Legal - Collins	(1,500.00)
1536	5/17/2016 The Antonino Firm	march	LLC : Legal - Collins	(1,320.19)
1536	5/17/2016 The Antonino Firm	january	LLC : Legal - Collins	(4,530.00)
1536	5/17/2016 The Antonino Firm	feb	LLC : Legal - Collins	(993.00)
Total Month Ending 5/31/2016				(8,343.19)

6/30/2016

Account transactions
All accounts

Num	Date Payee	Memo	Category	Amount
Grand Total				(200,438.72)

6/30/2016

Page 2

Account transactions
All accounts

Num	Date Payee	Memo	Category	Amount
1458	10/16/2015 The Antonino Fl...		LLC : Legal - Coppock	(900.00)
Total Month Ending 10/31/2015				(1,900.00)
Month Ending 11/30/2015				
1465	11/2/2015 Thompson, Wel...	10/27/15	LLC : Legal - Coppock	(1,400.00)
1468	11/10/2015 The Antonino Fl...		LLC : Legal - Coppock	(2,361.00)
Total Month Ending 11/30/2015				(3,761.00)
Month Ending 12/31/2015				
1517	12/22/2015 Thompson, Wel...	12/15/15	LLC : Legal - Coppock	(8,000.00)
Total Month Ending 12/31/2015				(8,000.00)
Month Ending 1/31/2016				
1469	1/4/2016 The Antonino Fl...		LLC : Legal - Coppock	(7,723.00)
Total Month Ending 1/31/2016				(7,723.00)
Month Ending 5/31/2016				
1536	5/17/2016 The Antonino Fl...	april	LLC : Legal - Coppock	(1,160.00)
1536	5/17/2016 The Antonino Fl...	march	LLC : Legal - Coppock	(540.00)
1536	5/17/2016 The Antonino Fl...	january	LLC : Legal - Coppock	(207.00)
1536	5/17/2016 The Antonino Fl...	feb	LLC : Legal - Coppock	(585.00)
Total Month Ending 5/31/2016				(2,492.00)
Grand Total				(151,416.44)

6/30/2016

Account transactions
All accounts

Page 1

Num	Date Payee	Memo	Category	Amount
Month Ending 12/31/2014				
1408	12/11/2014 The Antonino Fi...		LLC : Legal - Coppock	(830.00)
Total Month Ending 12/31/2014				
(830.00)				
Month Ending 1/31/2015				
1414	1/27/2015 The Antonino Fi...		LLC : Legal - Coppock	(2,221.00)
Total Month Ending 1/31/2015				
(2,221.00)				
Month Ending 3/31/2015				
1418	3/26/2015 The Antonino Fi...		LLC : Legal - Coppock	(1,305.00)
1423	3/26/2015 The Antonino Fi...		LLC : Legal - Coppock	(118.00)
Total Month Ending 3/31/2015				
(1,423.00)				
Month Ending 4/30/2015				
1433	4/14/2015 Thompson, Wel...	4/8/15 Coppock	LLC : Legal - Coppock	(1,920.34)
Total Month Ending 4/30/2015				
(1,920.34)				
Month Ending 5/31/2015				
1472	5/27/2015 The Antonino Fi...		LLC : Legal - Coppock	(3,410.00)
1477	5/27/2015 Thompson, Wel...	5/18/15; coppock	LLC : Legal - Coppock	(3,750.00)
Total Month Ending 5/31/2015				
(7,160.00)				
Month Ending 6/30/2015				
1485	6/25/2015 The Antonino Fi...		LLC : Legal - Coppock	(906.00)
1489	6/25/2015 Thompson, Wel...	7/16/15	LLC : Legal - Coppock	(7,500.00)
Total Month Ending 6/30/2015				
(8,406.00)				
Month Ending 7/31/2015				
	7/10/2015 DELTA AIR LIN...	flights to Atlanta	LLC : Legal - Coppock	(396.10)
1496	7/17/2015 The Antonino Fi...		LLC : Legal - Coppock	(4,957.00)
1505	7/30/2015 Thompson, Wel...	7/23/15	LLC : Legal - Coppock	(500.00)
Total Month Ending 7/31/2015				
(5,853.10)				
Month Ending 9/30/2015				
1444	9/9/2015 The Antonino Fi...		LLC : Legal - Coppock	(3,325.00)
1450	9/22/2015 Thompson, Wel...	9/14/15	LLC : Legal - Coppock	(96,402.00)
Total Month Ending 9/30/2015				
(99,727.00)				
Month Ending 10/31/2015				
1455	10/14/2015 The Antonino Fi...		LLC : Legal - Coppock	(1,000.00)

6/30/2016

Account transactions
All accounts

Page 1

Num	Date	Payee	Memo	Category	Amount
Month Ending 12/31/2014					
1408	12/11/2014	The Antonino Firm		LLC : Legal - Stamatov	(530.00)
Total Month Ending 12/31/2014					
(530.00)					
Month Ending 1/31/2015					
1414	1/27/2015	The Antonino Firm		LLC : Legal - Stamatov	(394.00)
Total Month Ending 1/31/2015					
(394.00)					
Month Ending 3/31/2015					
1423	3/26/2015	The Antonino Firm		LLC : Legal - Stamatov	(118.00)
1418	3/26/2015	The Antonino Firm		LLC : Legal - Stamatov	(2,285.00)
Total Month Ending 3/31/2015					
(2,403.00)					
Month Ending 4/30/2015					
1432	4/14/2015	Thompson, Welch, ...	4/8/15 Stamatov	LLC : Legal - Stamatov	(680.28)
Total Month Ending 4/30/2015					
(680.28)					
Month Ending 5/31/2015					
1472	5/27/2015	The Antonino Firm		LLC : Legal - Stamatov	(1,090.00)
1476	5/27/2015	Thompson, Welch, ...	5/18/15, Stamatov	LLC : Legal - Stamatov	(3,560.00)
Total Month Ending 5/31/2015					
(4,650.00)					
Month Ending 6/30/2015					
1485	6/25/2015	The Antonino Firm		LLC : Legal - Stamatov	(566.00)
1488	6/25/2015	Thompson, Welch, ...	6/17/15	LLC : Legal - Stamatov	(5,900.00)
Total Month Ending 6/30/2015					
(6,466.00)					
Month Ending 7/31/2015					
1496	7/17/2015	The Antonino Firm		LLC : Legal - Stamatov	(3,091.00)
1504	7/30/2015	Thompson, Welch, ...	7/23/15	LLC : Legal - Stamatov	(400.00)
Total Month Ending 7/31/2015					
(3,491.00)					
Month Ending 10/31/2015					
1458	10/16/2015	The Antonino Firm		LLC : Legal - Stamatov	(600.00)
1455	10/14/2015	The Antonino Firm		LLC : Legal - Stamatov	(320.00)
Total Month Ending 10/31/2015					
(920.00)					
Month Ending 11/30/2015					
1468	11/10/2015	The Antonino Firm		LLC : Legal - Stamatov	(1,202.00)
1466	11/2/2015	Thompson, Welch, ...	10/27/15	LLC : Legal - Stamatov	(4,000.00)

6/30/2016

Page 2

Account transactions
All accounts

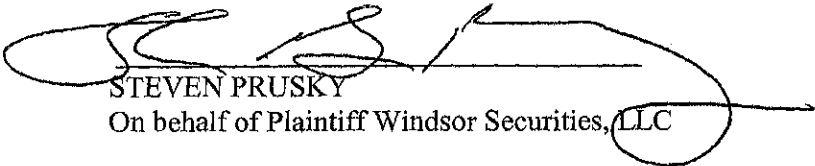
Num	Date	Payee	Memo	Category	Amount
Total Month Ending 11/30/2015					
(5,202.00)					
Month Ending 12/31/2015					
1515	12/22/2015	Thompson, Welch, ...	12/15/15	LLC : Legal - Stamatov	(4,310.00)
1520	12/29/2015	Offit Kurman	12/21/15: stama...	LLC : Legal - Stamatov	(5,213.50)
Total Month Ending 12/31/2015					
(9,523.50)					
Month Ending 1/31/2016					
1469	1/4/2016	The Antonino Firm		LLC : Legal - Stamatov	(709.00)
Total Month Ending 1/31/2016					
(709.00)					
Month Ending 5/31/2016					
1536	5/17/2016	The Antonino Firm	april	LLC : Legal - Stamatov	(250.00)
1536	5/17/2016	The Antonino Firm	feb	LLC : Legal - Stamatov	(745.81)
1536	5/17/2016	The Antonino Firm	january	LLC : Legal - Stamatov	(704.00)
1536	5/17/2016	The Antonino Firm	march	LLC : Legal - Stamatov	(250.00)
Total Month Ending 5/31/2016					
(1,949.81)					
Month Ending 6/30/2016					
1540	6/8/2016	Joseph Wood Attor...	5/25/16	LLC : Legal - Stamatov	(12,000.00)
Total Month Ending 6/30/2016					
(12,000.00)					
Grand Total					
(48,918.59)					

VERIFICATION

I verify that the statements made in the attached Plaintiff's' Response to Defendant Arent Fox, LLP's First Set of Interrogatories and First Requests for Production of Documents are true and correct to the best of my knowledge, information, and belief.

I understand that false statements made herein are subject to the penalties for unsworn falsification to authorities.

Dated: 6-JULY-16


STEVEN PRUSKY
On behalf of Plaintiff Windsor Securities, LLC